

State Water Resources Control Board

March 15, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8367

Mr. John Feldhans
Oxnard Airport Operations Supervisor
Ventura County Department of Airports
555 Airport Way, Suite B
Carmarillo, California 93010
john.feldhans@ventura.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT THE OXNARD AIRPORT, 2889 FIFTH STREET, OXNARD**

Dear Mr. Feldhans:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on February 22, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Monitoring Plan – In CERS, the monitoring plan lists “yes” for pipeline integrity testing, tank integrity testing, and no regulated pipe. These three items should list “no.”	All	February 22, 2018	Ongoing	23 CCR 2632(d)(1)
2	Failure to Provide Valid Board of Equalization (BOE) Number – The BOE number listed in CERS is invalid. A valid BOE number must be listed.	All	February 22, 2018	Ongoing	H&SC 25286(c)(9)
3	Failure to Provide Designated Operator (DO) Training – DO training documentation was not available at the time of inspection.	All	February 22, 2018	Ongoing	23 CCR 2715(f)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Perform DO Inspections – The monthly DO inspection reports were not available at the time of inspection.	All	February 22, 2018	Ongoing	23 CCR 2715(e)
5	Failure to Maintain Financial Responsibility – A current certificate of financial responsibility was not available at the time of inspection.	All	February 22, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
6	Failure to Tag Monitoring Equipment – At the time of inspection, annual monitoring certification tags were not affixed to the line leak detectors. Additionally, current certification tags were not affixed to tanks 1, 2, and 4 annular sensors or the monitoring system panel.	All	February 22, 2018	Ongoing	23 CCR 2638(f)
7	Failure to Monitor Product Piping – The sensors located in the tanks 1, 2, and 4 turbine sumps and tank 2 fill sump were not positioned at the lowest point. The sensor in the tank 3 turbine sump is located on the wrong side and not positioned at the lowest point, preventing its ability to detect a leak at the earliest opportunity.	All	February 22, 2018	Ongoing	23 CCR 2630(d)
8	Failure to Maintain Monitoring Records Onsite – Annual monitoring certification testing documentation dating back 3 years was not available at the time of inspection.	All	February 22, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Oxnard Fire Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance. Additionally, all liquid and debris inside any of the sumps must be removed. Lastly, please confirm the position of the sensor located in the tank 4 fill sump, since this sump was not inspected.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Nathan West
CUPA Manager, Coordinator
Oxnard Fire Department
360 West Second Street
Oxnard, California 93030
christopher.newcomb@oxnard.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Chris Newcomb
Fire Environmental Specialist
Oxnard Fire Department
christopher.newcomb@oxnard.org